

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

STANFORD GLABERSON)	
)	
Plaintiff,)	Civil Action No. 03-6604
)	
v.)	Honorable John R. Padova
)	
COMCAST CORPORATION, et al.,)	
)	
Defendants.)	
)	

DECLARATION OF CHRISTINE McGINTY

Christine McGinty hereby declares as follows pursuant to 28 U.S.C. § 1746:

1. I am employed by Comcast Corp. (“Comcast”) as the Senior Marketing Manager for Comcast’s Freedom Region, which includes Comcast’s cable systems in the counties of Bucks, Chester, Delaware, Montgomery and Philadelphia, Pennsylvania (as well as other areas of Pennsylvania, New Jersey, and Delaware). I have held this position since 2006. As Senior Marketing Manager for Comcast’s Freedom Region, my responsibilities include supervising customer notifications for the Philadelphia market.

2. I submit this declaration in connection with the class action Notice Program in *Glaberson v. Comcast Corp.* that was approved by the Court on December 12, 2014. This declaration discusses Comcast’s dissemination of the required individual settlement notices by mail and email to Comcast’s current subscribers. In preparing this Declaration, I have relied upon my personal knowledge, information obtained through discussions with other Comcast personnel and Comcast’s third party billing vendor, and Comcast’s business records.

3. Comcast regularly employs a third-party billing vendor, CSG International (“CSG”), located at 14301 Chandler Road, Omaha, Nebraska 68138, to distribute bills to

Comcast subscribers in the Philadelphia area on a monthly basis. Some subscribers receive paper bills. Other subscribers have elected to receive electronic bills. CSG typically handles the distribution of both types of bills.

4. At Comcast's instruction, CSG distributed individual settlement notices to Comcast's residential and commercial subscribers in the following Comcast cable systems during the March 2015 billing cycle, which ran from March 1 through March 28, 2015: Comcast of Philadelphia (Area 1), Comcast of Philadelphia (Area 2), Comcast of Philadelphia (Area 3/4), Comcast of Willow Grove, Comcast of Lower Merion, Comcast of Delaware County, Comcast of Chester County, Comcast of Montgomery County, and Comcast of Bucks County. These systems comprise all of the Comcast cable systems located in the counties of Bucks, Chester, Delaware, Montgomery and Philadelphia, Pennsylvania.

5. CSG successfully distributed a total of 654,953 individual settlement notices (exclusive of any undeliverable mail or email) as follows:

- a. Attached hereto as Exhibit A is a copy of the individual settlement notice that was sent to Comcast's residential subscribers and some Comcast commercial subscribers who receive paper bills between March 1 and March 28, 2015. Attached hereto as Exhibit B is a letter from CSG confirming that 502,931 such notices were successfully sent.
- b. Attached hereto as Exhibit C is a copy of the individual settlement notice that was sent to Comcast's residential subscribers who receive electronic bills between March 1 and March 28, 2015. Attached hereto as Exhibit D is a letter from CSG confirming that 151,090 such notices were successfully sent.

c. Attached hereto as Exhibit E is a copy of the individual settlement notice that was sent to Comcast's commercial subscribers who receive electronic bills between March 1 and March 28, 2015. Attached hereto as Exhibit F is a letter from CSG confirming that 932 such notices were successfully sent.

6. Comcast's residential and commercial subscribers who receive electronic bills received different versions of the notice because Comcast determined that it could not offer pay-per-view movies as an option for its commercial subscribers due to restrictions in its affiliation agreements that are memorialized in its commercial subscriber agreements. Comcast reached an agreement with Plaintiffs' counsel to add language to the notices to be sent to commercial subscribers receiving electronic bills to reflect that limitation. Comcast was not able to add the additional language to the notices that CSG mailed to Comcast's commercial subscribers who receive paper bills because the mailing process was already underway. Accordingly, Comcast reached an agreement with Plaintiffs' counsel to provide the Claims Administrator, Rust Consulting, Inc. ("Rust"), with the mailing list of those commercial subscribers so that Rust could send a postcard notice to those subscribers reflecting the updated language. Comcast provided a list of 11,180 subscribers for the postcard mailing, which was to be handled by Rust. Of the 11,180 subscribers on the postcard mailing list, 1,518 also received the notice described in paragraph 5(a) from CSG.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 8th day of May, 2015.


Christine McGinty